

DECLARATION OF TERRY BLACKFORD

1. My name is Terry Blackford. I am over the age of 18 years and I am of sound mind and competent to make the statements in this declaration. The statements that I am making in this declaration are based on my own personal knowledge, and these are the same statements that I would make if I were called as a witness to testify in court in this matter.

2. I am employed as a private investigator for Jarvis International Intelligence, Inc.

3. In 2006 and 2010, I was assigned to investigate allegations that Zeferino Saucedo sold saved Roundup Ready® cotton seed and planted his cotton crop with saved Roundup Ready® seed.

4. On December 13, 2006, I interviewed Zeferino Saucedo at his place of employment, West Texas Seed and Delinting, in Slaton, Texas.

5. Mr. Saucedo admitted that he sold saved cotton seed. He also stated that he obtained the seed he sold, and the seed he planted, from West Texas Seed and Delinting.

6. Mr. Saucedo explained that when growers wish to destroy treated cotton seed that is stored at West Texas Seed and Delinting, the owner allows him to take the seed for use as livestock feed. Mr. Saucedo also stated that if the germination of the cotton seed is good, he plants the seed or sells the seed to growers.

7. During my interview with Mr. Saucedo, he agreed to allow sampling of the cotton seed in his barn and the cotton in his fields.

8. The samples were tested with a field strip test. The samples from the barn and the fields tested positive for the CP4 gene associated with Monsanto's patented Roundup Ready® trait.

9. In the summer of 2010, investigators observed Mr. Saucedo planting cotton seed from white seed bags obtained from West Texas Seed and Delinting.

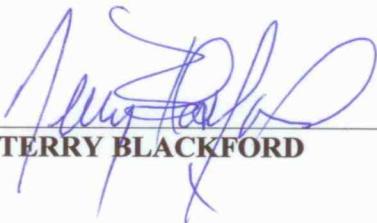
10. Several cotton seeds fell from the planter onto the public right-of-way.

11. Investigators collected the cotton seed from the public right-of-way and conducted field strip tests on the samples. The samples tested positive for the CP4 gene, associated with Monsanto's patented Roundup Ready® trait.

12. In October 2010, I interviewed Mr. Saucedo about his cotton crop. Mr. Saucedo denied planting saved Roundup Ready® seed, but admitted that he had several pallets of treated cotton seed in his barn. Mr. Saucedo refused to allow sampling of his fields or his stored seed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2010.


TERRY BLACKFORD